

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Granville
NC Facility ID: 3900009
Inspector's Name: Steven Carr
Date of Last Inspection: 11/12/2015
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Bridgestone-Bandag, LLC</p> <p>Facility Address: Bridgestone-Bandag, LLC 505 West Industry Drive Oxford, NC 27565</p> <p>SIC: 7534 / Tire Retreading And Repair Shops NAICS: 326212 / Tire Retreading</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Jerry Battle Environmental Coordinator (919) 603-5293 505 West Industry Drive Oxford, NC 27565</p>	<p style="text-align: center;">Authorized Contact</p> <p>Mark Averette Plant Manager (919) 693-8855 505 West Industry Drive Oxford, NC 27565</p>	<p style="text-align: center;">Technical Contact</p> <p>Paul Crosser Environmental Services Manager (563) 262-1368 2905 North Highway 61 Muscatine, IA 52761+5886</p>	<p>Application Number: 3900009.15A Date Received: 02/10/2015 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 02889/T18 Existing Permit Issue Date: 02/06/2015 Existing Permit Expiration Date: 10/31/2015</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	0.0200	3.63	163.80	3.03	3.79	10.03	6.06 [Carbon disulfide]
2013	0.0200	3.40	146.14	2.85	3.95	10.12	6.01 [Carbon disulfide]
2012	0.0200	2.90	132.48	2.44	3.89	9.93	5.90 [Carbon disulfide]
2011	0.0200	3.50	126.45	2.94	4.45	11.71	7.02 [Carbon disulfide]
2010	0.0200	3.20	124.37	2.68	4.06	10.40	6.20 [Carbon disulfide]

<p>Review Engineer: Jenny Sheppard</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 02889/T19 Permit Issue Date: Permit Expiration Date:</p>
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1. Purpose of Application:

Bridgestone-Bandag, LLC is currently operating under permit 02889T18 issued on February 6, 2015. The current permit expired October 31, 2015. The renewal application was received on February 10, 2015, eight months 20 days prior to the expiration date. The existing permit has expired and the facility is operating without a permit at this time.

At this time there are two 502(b)(10) modifications that will be incorporated into the draft permit. Application 3900009.14B was to replace the No. 3 Rubber Mixer (Banbury), emission source ID No. ES-5. Application 3900009.15C was to add an insignificant activity (ID No. IES-35, Twin Screw Roller) to replace the No. 1 Banbury Drop Mill (ID No. ES-18). Originally this modification was submitted as a minor modification (3900009.15B) but it was withdrawn after a determination was made that the proposed change would be considered an insignificant activity.

2. Facility Description

Bridgestone-Bandag manufactures truck tire retreading materials that are distributed to Bridgestone-Bandag dealer networks. At the plant, rubber and various additives (ex. - carbon black) are blended (with pressure and heat) in the Banbury mixers. The rubber is further processed through break mills and blend mills in preparation for extrusion. The extruded rubber is then sent to the press for molding and developing a tread pattern. Finally, the retread is buffed and processed through the finishing line rollers.

3. Application Chronology/History/Table of Changes

November 9, 2010	Renewal issued 02889T16 by Kevin Godwin.
April 1, 2014	Minor Modification issued 02889T17 by Kevin Godwin, applications 3900009.13A and 3900009.14A. Added black carbon silos and day bins, and added insignificant activities.
February 06, 2015	Minor Modification issued 02889T18 by Jeff Twisdale. Added engine to insignificant activities list. Determined facility to be an Area Source of HAPS.

Table of Changes to Permit 02889T18

Page No.	Section	Description of Change
All	N/A	Updated permit number and dates
Insignificant activity	N/A	Added Twin Screw Roller (ID No. IES-35)
All	All	Updated all rule references and updated permit language for conditions where appropriate.
5	2.1 A.4	Added Avoidance for Area Source MACT condition JJJJJ
15 - 26	3	Updated General Conditions to most recent shell version (v4)

4. New Equipment/Change in Emission and Regulatory Review

Since the last permit modification the following new equipment was added or changed during this review. No physical changes have been made at the Company since the last Title V permit was issued.

The facility is subject to the following regulations:

15A NCAC 2D .0503 - **PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS**
15A NCAC 2D .0515 - **PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**
15A NCAC 2D .0516 - **SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**
15A NCAC 2D .0521 - **CONTROL OF VISIBLE EMISSIONS**
15A NCAC 2D .0958 - **WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS**
15A NCAC 2D .1806 - **CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**
15A NCAC 2Q .0317 - **AVOIDANCE CONDITION FOR AREA SOURCES SUBJECT TO 40 CFR 63 Subpart JJJJJJ (6J)**

Based on the facility's recent permit revisions as well as recent compliance inspections performed by the Raleigh Regional office most, this facility is considered to be in compliance with all applicable Air Quality regulations.

5. Stipulation Review:

AVOIDANCE CONDITION FOR AREA SOURCES SUBJECT TO 40 CFR 63 Subpart JJJJJJ (6J) - In accordance with 15A NCAC 02Q .0317, the Permittee is avoiding applicability of 40 CFR 63 Subpart JJJJJJ (6J) "Industrial, Commercial, and Institutional Boilers Area Sources." The Permittee is permitted to operate the two natural gas/No. 2 fuel oil-fired boilers (ID Nos. ES-1 and ES-2). Per 40 CFR 63.11195(e), these/this source(s) is/are exempt from this Subpart because they are defined as gas-fired boiler(s) in 40 CFR 63.11237. In order to maintain this exemption, the Permittee is allowed to fire liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing on liquid fuel (periodic testing not to exceed a combined total of 48 hours during any calendar year).

- a. The Permittee shall maintain records that document the time periods when liquid fuel is fired and the reasons the liquid fuel is fired.
- b. If the Permittee fires liquid fuel for reasons other than gas curtailment, gas supply interruptions, startups, or for periodic testing on liquid fuel, the Permittee is no longer exempt from Subpart JJJJJJ (6J). As required by 40 CFR 62.11225(g), the Permittee must provide notice within 30 days of the fuel switch. The notification must identify:
 - i. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, and the date of the notice.
 - ii. The date upon which the fuel switch occurred.

As required by 40 CFR 63.11210(h), the Permittee must demonstrate compliance within 180 days of the effective date of the fuel switch.

6. NSPS Issues:

This facility is not currently subject to any NSPS regulations.

7. PSD/NAA Issues:

This facility is PSD Minor. Granville County has not been triggered for PSD increment tracking purposes. Granville County is in an attainment area and NAA does not apply.

8. MACT Issues:

This facility is subject to 40 CFR 63, Subpart JJJJJJ (Area Source MACT for Boilers (6J)).

9. 112(r) Issues:

This facility is not subject to 112(r).

10. CAM Issues:

This facility is not subject to CAM. In the previous renewal for this that all controlled sources have pre-control potential to emit less than 100% of the amount required for the source to be major (i.e. 100 tpy of any criteria pollutant or 10 tpy of any single HAP). Therefore, CAM does not apply.

11. Facility Wide Air Toxic Air Pollutants:

This renewal did not trigger a toxics review. Currently there are no conditions in the permit for toxic air pollutants.

12. Facility Compliance Status/Compliance History:

On February 25, 2014 a NOD was sent to Bridgestone-Bandag, LLC for missing (failure to submit semi-annual report) reporting requirements for various portions of Section 2.1 and 2.2 of the permit.

On December 29, 2014 a NOD was sent to Bridgestone-Bandag, LLC for missing (failure to document) recordkeeping requirements for the monthly VE's on the black carbon silos.

The facility was last inspected on November 12, 2015 by Steven Carr of the Raleigh Regional Office and found to be in compliance at the time of the inspection.

13. Public Notice / EPA and Affected State(s) Review

A notice of the draft Title V Permit was placed on the DAQ website. The notice provided for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice were sent to persons on the Title V mailing list and EPA. ***TO BE COMPLETED AFTER PUBLIC NOTICE(No additional comments were received.)***

Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. ***TO BE COMPLETED AFTER PUBLIC NOTICE (No additional comments were received)***. Also pursuant to 2Q .0522, a notice of the draft Title V Permit was provided to each affected State at or before the time notice provided to the public.

14. Conclusions, Comments, and Recommendations:

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

RRO recommends issuance of Permit No. 02889T19.

Recommend issuance of Permit No. 02889T19.